

EXHIBIT A-2

**PRIVILEGED & CONFIDENTIAL
ATTORNEY WORK PRODUCT
COMMON INTEREST COMMUNICATION
DRAFT DATED 6/30/22**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

DIVISION 80, LLC

Plaintiffs,

v.

MERRICK GARLAND, in his official
capacity as Attorney General of the United
States, *et al.*,

Defendants.

No. 3:22-CV-00148

**DECLARATION OF CHRISTOPHER MASTROIANNI IN SUPPORT OF AMICUS
BRIEF FOR MAJOR CITIES AND PROSECUTORS AGAINST GUN VIOLENCE**

I, Christopher Mastroianni, hereby declare under penalty of perjury, pursuant to 28
U.S.C. § 1746, as follows:

1. I am an Intelligence Division Sergeant at the Hartford Police Department. I have personal knowledge of the facts set forth below except for those stated on information and belief. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. In my role as a Intelligence Division Sergeant, I supervises the Department's Real Time Crime Center, which houses the Department's intelligence based work, to include gang, firearm & narcotics crimes. I have been in this position for approximately five years.

3. As part of its regular operations, the Hartford Police Department maintains in the ordinary course of business records of firearms collected in connection with an arrest, execution of a search warrant, or any other related law enforcement activity.

4. Beginning in 2020, the Hartford Police Department began collecting and recording data related to “ghost guns,” which are firearms personally made or modified by an individual that lack commercial serial numbers or other identifying marks.

5. According to Hartford Police Department records maintained in the ordinary course of business, 7 ghost guns were recovered in 2020 and 29 ghost guns were recovered in 2021.

6. These records also indicate that as of June 30th, 2022, law enforcement in Hartford had already seized 32 ghost guns in the year 2022.

7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 1, 2022
Hartford, Connecticut

Respectfully Submitted,

/s/ Christopher Mastroianni
Christopher Mastroianni